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9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA

11 BIRDDOG TECHNOLOGY  
LIMITED, an Australian company;  
12 and BIRDDOG AUSTRALIA PTY,  
LTD, an Australian company,

13 Plaintiffs,

14 v.

15 2082 TECHNOLOGY, LLC DBA  
16 BOLIN TECHNOLOGY, a California  
limited liability company; BOLIN  
17 TECHNOLOGY CO., LTD., a Chinese  
limited company; HOI "KYLE" LO, an  
18 individual; JENNIFER LEE, an  
individual; and DOES 3 through 25,  
19 inclusive,

20 Defendants.

Case No. 2:23-cv-09416 CAS (AGRx)

**PLAINTIFFS BIRDDOG  
TECHNOLOGY LIMITED'S AND  
BIRDDOG AUSTRALIA PTY LTD'S  
REQUEST FOR ENTRY OF  
DEFAULT PURSUANT TO FRCP  
55(a)**

*[Filed concurrently with Declaration of  
Gabriel M. Huey]*

**TO ALL PARTIES, THEIR ATTORNEYS OF RECORD, AND THE  
CLERK OF THE ABOVE-ENTITLED COURT:**

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiffs BirdDog Technology Limited and BirdDog Australia Pty Ltd (“Plaintiffs” or “BirdDog”) hereby request that the Clerk of the above-entitled Court enter default in this matter against defendant Bolin Technology Co., Ltd. (“Bolin Limited”) on the ground that said defendant has failed to appear or otherwise respond to Plaintiffs’ First Amended Complaint (“FAC”) within the time prescribed by the Federal Rules of Civil Procedure.

Bolin Limited<sup>1</sup> was substituted as the defendant previously sued under the fictitious name of Doe 1 on January 12, 2024. (Dkt. 34.) Bolin Limited was personally served with the Summons and FAC on February 12, 2024, pursuant to Fed. R. Civ. P. 4(h)(1)(B), and Plaintiffs filed the Proof of Service as Dkt. 58. Pursuant to Fed. R. Civ. Proc. 12, Bolin Limited was required to respond, answer or otherwise plead to Plaintiffs’ FAC by March 4, 2024. As of March 5, 2024, neither Bolin Limited nor anyone claiming to represent Bolin Limited has responded to the FAC or contacted Plaintiffs or their counsel to request an extension of time to respond to Plaintiffs’ FAC.

The above-stated facts are set forth in the accompanying Declaration of Gabriel M. Huey filed herewith. Because defendant Bolin Limited has failed to “plead or otherwise defend” in response to Plaintiffs’ FAC, Plaintiffs now request that the Clerk of the Court enter default against Bolin Limited pursuant to Fed. R. Civ. Proc. 55(a).

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<sup>1</sup> Bolin Limited is not a minor or incompetent person or in military service or otherwise exempted under the Soldiers’ and Sailors’ Civil Relief Act of 1940.

Respectfully submitted,

**K&L GATES LLP**

Dated: March 5, 2024

By: /s/ Ryan Q. Keech

Ryan Q. Keech

Gabriel M. Huey

Kevin G. Sullivan

*Attorneys for Plaintiffs*